

Message

From: Hoogerheide, Roger [Hoogerheide.Roger@epa.gov]
Sent: 6/17/2016 6:04:01 PM
To: Michael Ritorto [mritorto@rouxinc.com]; Cirian, Mike [Cirian.Mike@epa.gov]
CC: lidewitt@mt.gov; cowen@mt.gov; John.Stroiazio@glencore-ca.com; Steve Wright - CFAC [swright@cfaluminum.com]; Andrew Baris [abaris@rouxinc.com]; repinedl@cdmsmith.com
Subject: RE: Field Modification Form for CFAC

4.2.11 Field Changes

Modifications to the existing SAP may be made in the field and/or opportunistic samples may be taken. The ability to quickly modify field procedures is essential to ensure that project objectives are obtained. Documentation of the changes is critical to allow tracking of the actual procedures used in the field. This section briefly explains how changes may be made to the SAP.

The Tetra Tech Project Manager will continually monitor the field procedures to ensure that the objectives of the sampling program are accomplished. There will be instances though where field staff will need to make modifications to the field procedures. In these instances, when the modifications are considered minor, the modifications will be recorded in a field logbook.

However, there may be circumstances where modification of the procedures described in this SAP is necessary to complete project objectives. The DEQ Project Officer, EPA, Tetra Tech Project Manager, or Tetra Tech field staff may request modifications to the approved procedures. All modifications will be documented on a Record of Modification form prior to completion of the work. An example Record of Modification form is provided in Appendix D. If the modification impacts are minimal, the field staff will complete the Record of Modification form for approval by either the Field Staff Manager or DEQ Project Officer. If a project-wide modification is necessary, the DEQ project manager will complete the Record of Modification form and then consult with the EPA Remedial Project Manager for approval. The Tetra Tech Project Manager or field staff member will not implement the modification until verbal or written approval is granted by the DEQ Project Officer. If verbal approval is provided, the Tetra Tech Project Manager or field staff member will note on the modification form when the approval occurred and the DEQ Project Officer will sign the approval form at the earliest available time. All Record of Modification forms will be housed in the Tetra Tech office and provided as an appendix to the subsequent Data Summary Reports.

Here is the language that DEQ, EPA and Tetra Tech agreed to place in the SAP for the carpenter snow creek mining district NPL site RI/FS and propose that we insert similar language into the CFAC SAP addendum prior to finalization. The modification form was not attached in the electronic copy of the SAP that I have on my computer. Please give me a business day or so to get it since my field team leader is out of the office today and I am in the field on Monday.